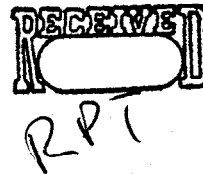


(2)

May 1, 1999

Department of the Interior
Minerals Management Service
Mail Stop: 4024
381 Elden Street
Herndon, Virginia 20170-4817



Attention: Proposed Rule Team

Reference: Training of Lessee and Contractor Employees Engaged in Oil and Gas and Sulphur Operations in the Outer Continental Shelf (OCS)

To Whom It May Concern:

The following are comments for consideration of the Proposed Rule concerning 30 CFR 250, Subpart "O" [[Page 19320, Paragraph 4]] which states:

To implement this rule, we will periodically assess company performance to determine how well its employees are trained. This assessment will include implementation of one or more of the following techniques: training system audits, employee interviews, written testing, and equipment-based hands-on testing. We are seeking input on what situations and threshold levels we should use as a part of our assessment of your training program to trigger the different enforcement actions included in this rule. Some specific issues to address in your comments should include the following:

--Is there a specific written test score (re: threshold level) we should use to signify the competency of an individual?

COMMENT

The competency of an individual is unique to the job duty, job assignment, and job responsibilities for which they are required to perform. A "Catch All" threshold level for personnel working in the Outer Continental Shelf (OCS) will not and cannot determine the competency of an individual as intended by the Proposed Rule, Section 250.1501 (What is the goal of my training program?- The goal of your training program is safe and clean OCS operations. To accomplish this goal, you must ensure that your employees are experienced and competent in respective work assignments)

As an example:

What would be required for a "Compressor Mechanic" to be considered competent with respect to Production Safety Systems, Recommended Practices, Rules, and Regulations?

This individual should have a basic understanding of:

1. Subsurface Safety Devices
2. Design Installation and Operation
3. Additional System Requirements
4. Testing and Record
5. Pipeline Requirements
6. API-RP-14C; Section 1, General
7. API-RP-14C; Section 2, Safety Device Symbols and Identification
8. API-RP-14C; Section 3, Introduction to Safety Analysis and System Design
9. API-RP-14C; Section 4, Protection Concepts and Safety Analysis

10. API-RP-14C; Section A-1, Wellheads and Flow Lines
11. API-RP-14C; Section A-2, Wellhead Injection Lines
12. API-RP-14C; Section A-3, Headers
13. API-RP-14C; Section A-5, Atmospheric Vessels
14. API-RP-14C; Section A-6, Fired and Heated Components
15. API-RP-14C; Section A-7, Pumps
16. API-RP-14C; Section A-9, Pipelines
17. API-RP-14C; Appendix D, Testing and Reporting Procedures

This same individual should have an average or above understanding of:

1. API-RP-14C; Section A-4, Pressure Vessels
2. API-RP-14C; Section A-8, Compressors
3. API-RP-14C; Appendix C, Support Systems
4. Hands-on of devices associated with Compressors and Pressure Vessels
5. Pollution Prevention and Waste Management
6. Safe Work Practices
7. Operational Hazards and Operational Hazards Analysis

As another example:

What would be required for a "Entry Level Operations" or "Operator Helper" to be considered competent with respect to Production Safety Systems, Recommended Practices, Rules, and Regulations?

This individual should have a basic understanding of:

1. Subsurface Safety Devices
2. Design Installation and Operation
3. Additional System Requirements
4. Testing and Record
5. Pipeline Requirements
6. API-RP-14C; Section 1, General
7. API-RP-14C; Section 2, Safety Device Symbols and Identification
8. API-RP-14C; Section 3, Introduction to Safety Analysis and System Design
9. API-RP-14C; Section 4, Protection Concepts and Safety Analysis
10. API-RP-14C; Section A-1, Wellheads and Flow Lines
11. API-RP-14C; Section A-2, Wellhead Injection Lines
12. API-RP-14C; Section A-3, Headers
13. API-RP-14C; Section A-4, Pressure Vessels
14. API-RP-14C; Section A-5, Atmospheric Vessels
15. API-RP-14C; Section A-6, Fired and Heated Components
16. API-RP-14C; Section A-7, Pumps
17. API-RP-14C; Section A-8, Compressors
18. API-RP-14C; Section A-9, Pipelines
19. API-RP-14C; Appendix C, Support Systems
20. API-RP-14C; Appendix D, Testing and Reporting Procedures
21. Hands-on of Safety Devices
22. Pollution Prevention and Waste Management
22. Safe Work Practices
23. Operational Hazards and Operational Hazards Analysis

--If an individual or group of individuals receives a written test score below a level determined to signify competency, should we (MMS) issue an INC, conduct a retest, or initiate some other type of enforcement action?

COMMENT

The procedure for "To Signify Competency" should be specific for the individual's respective work assignment and must be able to distinguish from "Entry Level", "Multi-Crafted", "Mechanics", and other types of workers that work in the Outer Continental Shelf (OCS).

Once a competency level "Threshold" is established for the multiple types of work assignments and an individual or group of individuals score below a level determined to signify competency MMS should take enforcement actions as described in 250.1513.

--What issues should MMS focus on when conducting employee interviews?

COMMENT

MMS should conduct interviews of employees in the following elements:

1. Current Job or Respective Work Assignment
2. Length of Time Employee has been on the Specific Facility
3. Length of Time Employee has been in Current Work or Job Assignment
4. Previous 5 years Job or Respective Work Assignments
5. Previous 5 years Job Related Training and Education
6. Total amount in years of Oil Field Experience
7. Are you Trained and Qualified for your Respective Work Assignment?
8. Questions pertaining to Specific Facility Flow Scheme, Components, Facility Condition or Problems, and any Perceived or Potential Hazards
9. Incidents of Non-Compliance that the Facility has recently received and corrected.
10. General Information about Safe Work Practices, Environmental Policies or Practices, Operating Procedures, SPCC Plan, Welding Plan, SIMOPS, and Maintenance of Required Documents
11. Platform Walk-Thru with Employee to determine if Individual has Safety Device and Device Function Action Understanding of that particular Facility
12. Platform Walk-Thru with Employee to observe Pollution Inspection, General Facility Condition, Fire Fighting and Life Saving Equipment Locations, PPE Locations, ESD Locations, Support Systems, and General Housekeeping

--How often should these interviews be conducted?

COMMENT

MMS should conduct interviews from a selected number of employees from each lessee. This number should be determined by the total number of employees (lessee, contractor, and sub-contractor) and be a standardized percentage. (Such as 2% of total employees randomly selected during each annual announced or unannounced facility inspection)

--What situations should trigger MMS to conduct an Employee Interview?

COMMENT

MMS should conduct interviews of employees annually as described in the previous comment. Other conditions that should warrant Employee Interviews are as follows:

1. Pollution Event
2. Accident
3. Fatality
4. Fire or Explosion
5. High Incident of Non-Compliance's Issued to lessee
6. Lessee, Contractor, or Sub-Contractor Requests

--What type of enforcement action should MMS initiate if during an employee interview and employee exhibits on a minimal understanding of the employer's training program?

COMMENT

MMS should conduct Written Testing, Hands On, Simulator, or other types of testing to determine if the individual is qualified and competent in their Respective Work Assignment before initiating enforcement action.

If the individual does not achieve the necessary "Threshold Level for their Respective Work Assignment", then enforcement actions of Section 250.1513 should be determined as to the potential risks or hazards, accident, pollution, fatality, fire, explosion, or number of non-compliance's the lessee has received.

--Are there any situations where the MMS should not allow an employee to continue working in the OCS?

COMMENT

No, if the MMS determines that an individual is not qualified or competent to perform their respective work assignment; the situation, conditions, and potential risks and hazards should be assessed to determine if the facility is required to be shut-in, or if the lessee can supply a competent employee to replace or directly supervise the individual.

The employee should be allowed to participate in training, and other educational programs to assist them with achieving the necessary knowledge and skills to be able to perform the respective work assignment and future assignments.

--Under what circumstances should MMS initiate hands-on testing of employees?

COMMENT

MMS should conduct announced and unannounced hands-on testing of randomly selected employees annually.

If you have any questions or clarifications, please contact me @ (318) 993-9555 or by using my Email address which is OPC1@Cajun.net

Respectfully,

A handwritten signature in black ink, appearing to read 'Rick Deare', with a long horizontal flourish extending to the right.

Frederick L. (Rick) Deare
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